

# MEMO ENDORSED

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August 26, 2021

## FILED VIA ECF

Honorable Edgardo Ramos  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 619  
New York, New York 10007

Re: *Gonzalez v. Hanover Ventures Marketplace, LLC, et al.*  
Case No: 21-CV-1347 (ER)

Dear Judge Ramos:

The undersigned represents Defendants Hanover Ventures Marketplace LLC, d/b/a Le District, John Doe Company 1, d/b/a HPH Hospitality, Paul Lamas, Peter A Poulakakos, Nicolas Abello and David Coucke (Defendants") in the above-referenced action. In response to the letter motion filed by Plaintiff Denny Gonzalez ("Plaintiff") on August 24, 2021 [Docket 31], Defendants have today served complete, verified responses to Plaintiff's Interrogatories and Requests for Production along with responsive documents.

With respect to depositions, Defendants first noticed the deposition of Plaintiff on April 13, 2021 and are hopeful of receiving a mutually-agreeable date from Plaintiff's counsel in the near future. Defendants will of course provide mutually-agreeable dates for all requested deponents noticed by Plaintiff on July 9, 2021 once the Plaintiff's deposition is scheduled. The cutoff for non-expert depositions is *March 30, 2022*.

THE LAW OFFICES OF WAYNE KREGER

*Wayne S. Kreger*

WAYNE S. KREGER

cc: CK Lee, Esq.

The request for a conference is denied without prejudice. The parties are directed to file a joint status report regarding the status of depositions by September 13, 2021. The Clerk of Court is respectfully directed to terminate the motion. Doc. 31.

So ordered.



Edgardo Ramos, U.S.D.J

Dated: 8/30/2021

New York, New York